

## WWW.MKCLAWGROUP.COM LAW OFFICES OF MICHAEL K. CHONG, LLC

NEW YORK: 1250 BROADWAY, 36TH FL. STE. 300 NEW YORK, NEW YORK 10001 (212) 726-1104 FAX (212) 726-3104 FORT LEE: 2 EXECUTIVE DRIVE, STE. 720 FORT LEE, NEW JERSEY 07024 (201) 947-5200 FAX (201) 708-6676

\* Please Reply to: FORT LEE

HOBOKEN: 300 HUDSON STREET. STE. 10 HOBOKEN, NEW JERSEY 07024 (201) 708-6675 FAX (201) 708-6676

EMAIL: MKC@MKCLAWGROUP.COM

February 13, 2018

Honorable Richard J. Sullivan United States District Judge Southern District of New York Thurgood Marshall Courthouse 40 Foley Square New York, New York 10007 VIA ECF AND E MAIL

> Re: Rahman v. Ghandi Café et. al. Civil Action No. 17-cv-6054 (RJS)

Dear Judge Sullivan:

This office represents Defendants Ghandi Café, Inc. and Faruk Miah in the above captioned matter. I have reviewed and considered Plaintiff's application to amend the Complaint to substitute Monju Chowdhury for the "Jane Doe" named in the Complaint.

Recognizing the liberal standard for amending pleadings, Defendants do not oppose the application to amend the Complaint to substitute Monju Chowdhury for the "Jane Doe" named in the Complaint. In determining not to oppose the amendment of the Complaint, Defendants do not concede the accuracy of the allegations of the Amended Complaint as against Defendant Monju Chowdhury, and reserve the right to move to dismiss the Amended Complaint as to Defendant Chowdhury after the completion of discovery.

Thank you for your consideration of this matter.

Respectfully submitted,

Michael K. Chong Michael K. Chong